

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**CASTRO & CO., LLC,**  
*Plaintiff,*

v.

**DIAMOND OFFSHORE SERVICES  
LIMITED, JANE MUNOZ AND  
EMILY ROSENBERG,**  
*Defendants.*

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**Civil Action No. 3:18-cv-00574-M**

**Defendant Diamond Offshore Services Limited's  
Motion for Leave to Proceed Without Local Counsel (per Local Rule 83.10(a))**

1. Pursuant to Local Rule 83.10(a), Defendant, Diamond Offshore Services Limited (Diamond),<sup>1</sup> respectfully requests leave to proceed without local counsel.

2. Diamond's Houston-based counsel, Paul J. Dobrowski and Anthony D. Weiner, of Dobrowski, Larkin & Johnson LLP, are attorneys in good standing that have been admitted to practice in the Northern District of Texas.

3. Diamond's counsel are prepared to travel and appear as directed by the Court. Diamond's counsel further recognizes and accepts the obligation to fulfill all local-counsel requirements and abide by all local-counsel rules of this Court, including the standards of litigation conduct set forth in *Dondi Properties Corporation v. Commerce Savings & Loan Association*, 121 F.R.D. 284 (N.D. Tex. 1988)(per curiam).

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<sup>1</sup> Defendants Munoz and Rosenberg have been dismissed pursuant to Plaintiff's March 16, 2018, Notice of Voluntary Dismissal. See **Dkt. 4** (dismissal prior to appearance; effective upon filing).

4. Diamond intends to move for dismissal of this action pursuant to grounds provided for in Federal Rule of Civil Procedure 12(b), and anticipates that the Court's pre-answer rulings may resolve this matter in its entirety.<sup>2</sup>

5. Should the Court grant this motion, and at a later date determine that proceeding without local counsel in any way disrupts this litigation or results in a failure to comply with this Court's rules, Diamond will immediately take steps to obtain local counsel.

Respectfully submitted,

**DOBROWSKI, LARKIN & JOHNSON L.L.P.**

*By: Anthony D. Weiner* \_\_\_\_\_

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**Attorneys for Diamond Offshore Services  
Limited**

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<sup>2</sup> This motion is not a responsive pleading, an answer on the merits, or an affirmative action affecting any pre-answer defenses or motions, including but not limited to objections and filings permitted pursuant to Federal Rule of Civil Procedure 12(b).

**Certificate of Conference**

Pursuant to Local Rule 7.1(a), counsel for Diamond conferred with counsel for Plaintiff, Joshua Scott Milam, on April 3, 2018. Plaintiff is opposed.

Anthony D. Weiner  
Anthony D. Weiner

**Certificate of Service**

All parties received notice of this filing by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

Anthony D. Weiner  
Anthony D. Weiner